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MEMO ENDORSED

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STUART F. PIERSON
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July 18, 2017

Honorable Richard M. Berman
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312
Filed by S.D.N.Y. ECF

USDC SDNY
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DATE FILED: <u>7/31/17</u>

Re: United States v. Todd R. Howe, 1:16-cr-00632-RMB

Dear Judge Berman,

We are writing as counsel for Todd R. Howe, who entered a plea of guilty before you in the captioned case on September 22, 2016, concerning scheduling Mr. Howe's status conferences with the Court. His next status conference is scheduled for August 21, 2017.

Mr. Howe's case is pending sentencing during the proceedings in the case of *United States v. Percoco, et al.*, Case No. 1:16-cr-00776-VEC, S.D.N.Y.

Following Mr. Howe's request to move his residence to the State of Idaho with the consent of the Government, the Court, on July 17, 2017, approved Mr. Howe's request, permitting travel within and to/from the District of Idaho.

Considering the distance between Idaho and New York City, and the apparent likelihood that Mr. Howe will not be called soon to testify in *United States v. Percoco*, No. 16-cr-00776-VEC, Mr. Howe respectfully requests that the Court postpone the August 21 status conference until later this year, or allow Mr. Howe to participate in that status conference by telephone.

The Government has advised that it consents to Mr. Howe's request to postpone his status conference until later this year.

Respectfully submitted,

s/

Richard J. Morvillo

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Conference is adjourned to	
12-14-17 at 10:00 am	
SO ORDERED:	<i>Richard M. Berman</i>
Date: 7/31/17	
Richard M. Berman, U.S.D.J.	